

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

Kari Lynn Kuechenmeister
Timothy Lawrence Kuechenmeister,

BKY Case No. 04-60471 DDO

Debtors.

Headwaters Federal Credit Union,

Plaintiff,

ADV. Case No. 04-6047

vs.

Kari Lynn Kuechenmeister
Timothy Lawrence Kuechenmeister,

Defendants.

**NOTICE OF HEARING AND MOTION TO COMPEL
DISCOVERY AND FOR EXTENSION OF TIME**

Kari Lynn Kuechenmeister and Timothy Lawrence Kuechenmeister, Defendants in their proceeding, by and through their attorney, Robert A. Woodke, hereby move the Court for an order compelling answers to interrogatories and for a Federal Rules of Civil Procedure Rule 26 Report. A true copy of the interrogatories are attached hereto as Exhibit "A". Defendants further move the Court for an extension of time to cut off discovery and non-dispositive motions to November 30, 2004 and for dispositive motion to January 5, 2005.

This Court will hold a hearing on this motion on October 14, 2004, at 1:30 p.m., or as soon thereafter as counsel may be heard, before the Honorable Dennis D. O'Brien, Judge of the United States Bankruptcy Court, Courtroom 228A, 200 Warren E. Berger Federal Building, 316 North Robert Street, St. Paul, Minnesota.

Any response to this motion must be filed and delivered not later than October 11, 2004, which is three (3) business days before the date set for the hearing or filed and served by mail not later than October 5, 2004, which is seven (7) business days before the date set for the hearing. PURSUANT TO LOCAL RULE 9013-2(f), UNLESS A WRITTEN RESPONSE IS TIMELY SERVED AND FILED, THE BANKRUPTCY COURT MAY ENTER AN ORDER GRANTING THE REQUESTED RELIEF WITHOUT A HEARING.

This Motion is filed pursuant to Bankruptcy Rules 7002, 7026, 7033, 7037 and Local Rules 9013-1 through 9013-3. Defendants seek an order compelling answers to interrogatories, a Federal Rules of Civil Procedure Rule 26 Report and for an extension of time to cut off discovery and non-dispositive motions to November 30, 2004 and for dispositive motion to January 5, 2005.

The Summons and Complaint in this adversary proceeding were served and filed on July 2, 2004.

This Court has jurisdiction over this motion pursuant to 28 U.S.C. § 1334 and 157(a), Bankruptcy Rule 7033 and 7037 and Local Rules 7007-1 and 7037-1. This is a core proceeding.

This motion is made on the basis that the interrogatories are non-privileged and are reasonably calculated to lead to the discover of admissible evidence and Plaintiff has failed and refused and still fails and refuses to respond to Defendants interrogatories, although Defendants have frequently and continuously requested and demanded that Plaintiff respond to interrogatories.

This motion is based on this Notice of Motion and Motion, the memorandum in support hereof, the proposed Order submitted herewith, and all other papers and argument the Court shall entertain in connection with the submission of this motion.

Certification of Counsel

I certify that I conferred in good faith with Allen Haugrud, counsel for Plaintiff in an

effort to obtain answers to interrogatories in a timely fashion and to obtain Rule 26 disclosures,
without court action, but was unable to do so.

Dated: 9-29-04

BROUSE, WOODKE & MEYER, P.L.L.P.

By 

Robert A. Woodke, Attorney for Defendants

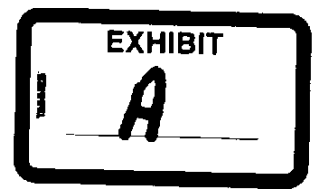
312 America Avenue NW

P. O. Box 1273

Bemidji, MN 56619-1273

(218) 759-1673

MN ID #11876X



UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

Kari Lynn Kuechenmeister
Timothy Lawrence Kuechenmeister,

BKY Case No. 04-60471 DDO

Debtors.

Headwaters Federal Credit Union,

Plaintiff,

ADV. Case No. 04-6047

vs.

Kari Lynn Kuechenmeister
Timothy Lawrence Kuechenmeister,

Defendants.

DEFENDANTS INTERROGATORIES TO PLAINTIFF

To: Plaintiff, Headwaters Federal Credit Union, and their attorney Thomas D'Albani, Cann Haskell, D'Albani & Schueppert, PA, 205 Seventh St NW, Bemidji, MN 56601.

Please take note that pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, the Defendant demands the answers to the following Interrogatories within thirty (30) days as required by said rules.

INSTRUCTIONS

In answering these interrogatories furnish all information, however obtained, including hearsay which is available to you, and information known by or in possession of yourself, your agents, investigators and attorneys or appearing in any record you possess or have access to.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

A question which seeks information contained in or information about or identification of any documents may be answered by providing a copy of such document for inspection and copying or by furnishing a copy of such document without a request for production.

DEFINITIONS

Identify- means to state the name, home and business addresses, telephone number, current occupation and place of employment and relationship, business or otherwise, with the person to whom these interrogatories were directed, of the person whose identity is sought. If the identity question relates to a corporation or other business entity, please provide the name of the business, the nature of the organization (whether a corporation, LLC, partnership, etc.) its principal place of business and the name and phone number of its chief executive officer.

Property- means all interests in any thing of value, both real, personal, or mixed, including, without limitation, contract rights, patents, trademarks, copyrights, rights to receive payments under licenses or royalties; accounts or notes receivable; stocks, bonds, mutual funds, annuity contracts, certificates of deposits, savings accounts, checking accounts, NOW accounts, money management accounts, and the like.

Describe- This word means to specify in detail and to particularize the content of the answer to the question and not just to state the reply in summary or outline fashion.

Document- This word means any written or recorded or graphic matter, whether produced, reproduced, or stored on papers, cards, tapes, belts, or computer disks (hard or floppy), devices, CD s, optical media, or any other medium in your possession, custody or control or known to you to exist and includes originals, all copies of originals, and all prior drafts.

INTERROGATORIES

1. Identify each person who contributed information to the Answers to these Interrogatories.
2. Provide a detailed description of all financial transactions between Plaintiff and Defendants.
3. Identify all persons whom you claim have knowledge of any business dealings arising between Plaintiff and Defendant and state in detail, not in summary fashion, the information they possess.
4. Identify all persons with knowledge of the facts alleged in the Complaint herein; and state in detail, not in summary fashion, the information they possess.
5. Identify any correspondence, document, memorandum, billing, bill of lading, receipt, or other evidence of transactions between Plaintiff and Defendant which are the basis for Plaintiff's complaint.

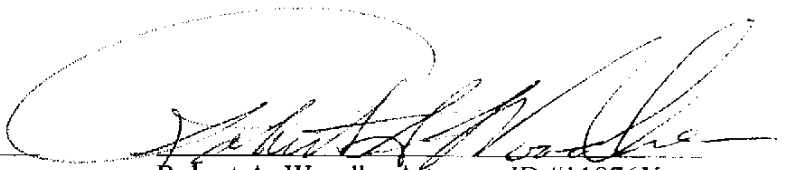
6. State the names and addresses of any and all expert witnesses you have consulted with, but who are not expected to testify at the time of trial, with respect to the issues of the above-captioned matter, and including the following:
- i. The professional qualifications of said expert witness.
 - ii. The subject matter upon which said expert was consulted.
 - iii. The substance of any and all opinions rendered by said expert.
 - iv. The basis for said opinion and the facts upon which said expert relies.
7. State the names and addresses of any and all expert witnesses you have consulted that are expected to testify at the time of trial and include the following:
- v. The professional qualifications of said expert witness.
 - vi. The subject matter upon which said expert was consulted.
 - vii. The substance of any and all opinion rendered by said expert.
 - viii. The basis for said opinions and the facts upon which said expert relies.

These interrogatories are continuing in nature, and it is specifically requested and demanded that all information coming to your attention subsequent to the completion of your answers to these interrogatories which is in any manner relevant to such interrogatories be promptly made available to defendant's counsel.

Brouse, Woodke & Meyer P.L.L.P.

Dated

8-6-04



Robert A. Woodke Attorney ID #11876X
Attorney for Defendants
312 America Avenue NW
PO Box 1273
Bemidji, MN 56619-1273
(218)759-1673

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

Kari Lynn Kuechenmeister
Timothy Lawrence Kuechenmeister,

BKY Case No. 04-60471 DDO

Debtors.

Headwaters Federal Credit Union,

Plaintiff,

ADV. Case No. 04-6047

vs.

Kari Lynn Kuechenmeister
Timothy Lawrence Kuechenmeister,

Defendants.

UNSWORN CERTIFICATE OF SERVICE

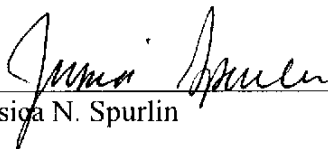
Jessica N. Spurlin, being first duly sworn, upon oath, deposes and says that on the 6th day of August, 2004, she did serve via United States Mail addressed to:

Thomas D'Albani
Cann, Haskell, D'Albani
& Schueppert, PA
205 Seventh Street NW
Bemidji, MN 56601

Tamara L. Yon
Trustee
PO Box 605
Crookston, MN 56716

United States Trustee
1015 U.S. Courthouse
300 South 4th Street
Minneapolis, MN 55415

in which envelopes she did place a true and correct copy of **Defendants' Interrogatories to Plaintiff and Defendants' Request For Production Of Documents And Things to Plaintiff.**



Jessica N. Spurlin

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

Kari Lynn Kuechenmeister
Timothy Lawrence Kuechenmeister,

Debtors.

BKY Case No. 04-60471 DDO

Headwaters Federal Credit Union,

Plaintiff,

ADV. Case No. 04-6047

vs.

Kari Lynn Kuechenmeister
Timothy Lawrence Kuechenmeister,

Defendants.

**MEMORANDUM IN SUPPORT OF
MOTION TO COMPEL DISCOVERY**

This memorandum is submitted in support of the attached Motion to compel discovery.

I. STATEMENT OF FACTS

On August 6, 2004, counsel for Defendants served Interrogatories upon Plaintiff.

Plaintiff made no response to the interrogatories.

In a letter to counsel for Defendants, dated September 20, 2004, counsel for Plaintiff stated that Plaintiff was working on answering interrogatories. A copy of said letter is attached hereto as Exhibit "E". To date, Defendants have received no answers to interrogatories.

II. ARGUMENT

The relief requested from this Court by Defendants is authorized under Federal Rules of Civil Procedure 37. The failure of Plaintiff to provide information to their legal counsel responsive to the interrogatories creates a disadvantage to defendants and hinders the preparation for trial.

Plaintiff should not be permitted to benefit from their lack of diligence and for changing attorneys in the middle of litigation.

Extending the time to complete discovery and the motion deadlines is necessary to avoid irreparable harm to Defendants that lack of preparation time would cause.

III. CONCLUSION

For all the reasons stated above, Defendants motion should be granted and this Court should order Plaintiff to produce the requested answers to interrogatories and extend the deadline as requested in the motion.

Respectfully submitted,

Dated: 9/30/04

BROUSE, WOODKE & MEYER, P.L.L.P.

By 

Robert A. Woodke, Attorney for Defendants
312 America Avenue NW
P. O. Box 1273
Bemidji, MN 56619-1273
(218) 759-1673
MN ID #11876X

SVINGEN, HAGSTROM, KARKELA, CLINE & DIRKS, PLLP

RESPOND TO FERGUS FALLS OFFICE

ATTORNEYS & COUNSELORS AT LAW

L. KRISTIAN SVINGEN ★
 DENNIS W. HAGSTROM ▲
 PERRY A. KARKELA ★
 J. CLINE ★
 SCOTT M. DIRKS ★

ALLEN R. HAUGRUD
 THOMAS C. ATHENS ★
 DAVID J. EILERTSON ★
 PAUL B. HUNT
 GREG J. LARSON

A PROFESSIONAL LIMITED LIABILITY PARTNERSHIP

OFFICES IN:
 FERGUS FALLS
 FERNAM
 PELICAN RAPIDS
 BATTLE LAKE

WEEKLY OFFICE HOURS IN:
 DALTON
 UNDERWOOD
 VERCAS

EXHIBIT

E

September 20, 2004

Robert A. Woodke
 Brouse, Woodke & Meyer, PLLP
 312 America Ave. NW
 PO Box 1273
 Bemidji, MN 56619-1273

FAX TRANSMISSION
 218-444-4014

Re: Headwaters Federal Credit Union vs. Kari Kuechenmeister and Timothy Kuechenmeister

Dear Mr. Woodke:

We received your fax. John is working on gathering up the signature cards, bank statements, loan documents, and amortization schedules for all loans in the Complaint. The Credit Union does not normally prepare amortization schedules with loans, but we will try and comply. We will bring over copies of what has been gathered up at the time of the deposition (10:30 a.m. on September 21, 2004).


I understand there was a change in software, or other changes, which make it difficult to retrieve some older documents. I believe those under account number 8199 to the present are still available.

We are also working on answering the interrogatories. I believe the summary sheets, loss review sheets, and related documents illustrate what we believe occurred.

At this time, we believe the witnesses would consist of those parties shown in the documents already produced. We do not anticipate any expert witnesses, unless Brady Martz would be deemed an expert witness.

Thank you for your assistance with this matter.

Sincerely,


 Allen Haugrud
 AH:

★ Also admitted to practice in ND ★ Civil Trial Specialist Certified by the Minnesota State Bar Association ★ Qualified ADR Neutral Civil Mediation/Arbitration
 ★ Real Property Law Specialist Certified by the Minnesota State Bar Association ★ Qualified ADR Neutral Civil & Family Mediation/Arbitration

125 South Mill Street • P.O. Box 687 • Fergus Falls, MN 56538-0687
 218-736-5456 • toll free: 800-625-3122 • fax: 218-739-5331 • email: management@firmanswer.com

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

Kari Lynn Kuechenmeister
Timothy Lawrence Kuechenmeister,

BKY Case No. 04-60471 DDO

Debtors.

Headwaters Federal Credit Union,

Plaintiff,

ADV. Case No. 04-6047

vs.

Kari Lynn Kuechenmeister
Timothy Lawrence Kuechenmeister,

Defendants.

**AFFIDAVIT OF ROBERT A. WOODKE IN SUPPORT
OF MOTION TO COMPEL DISCOVERY AND EXTENSION
OF TIME TO FILE DISPOSITIVE AND NON-DISPOSITIVE MOTIONS**

I, Robert A. Woodke declare:

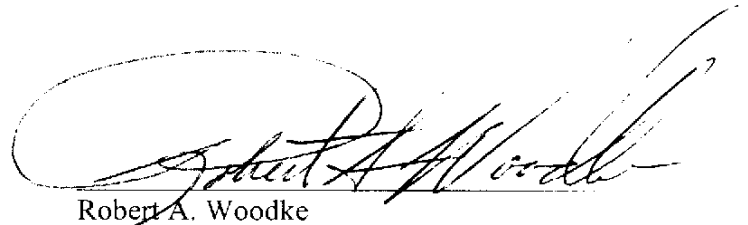
1. I am an attorney licensed to practice law in this state and I represent Defendants in this action.
2. I make this Affidavit in support of the Motion to Compel Discovery and for the extension of time to file non-dispositive motions, and extension of time to file the dispositive motions.
3. On August 6, 2004, I served Interrogatories upon Thomas D'Albani, then, counsel for Plaintiff in the action.
4. Attached to the motion as Exhibit "A" is a true copy of the interrogatories.
5. I have had difficulty obtaining answers to discovery from the Plaintiff.
6. That on September 28, 2004 I discussed with Plaintiff's current counsel, Allen Haugrud,

the absence of the answers to our Interrogatories. He indicated that he thought he could provide me with answers at this time, but they would be incomplete because at this point his client had not provided him the necessary information to respond to the interrogatories in detail. I asked him when those answers might be forthcoming, he indicated to me it would be sometime in the next week, which is after the deadline for the completion of the discovery.

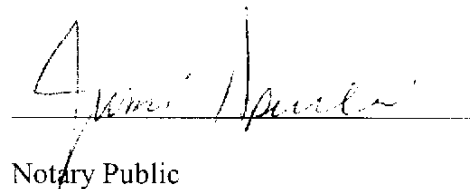
7. Mr. Haugrud took the case over in late August and has worked diligently to catch up, but his client apparently did nothing to response to discovery prior to the change of attorney.
8. Attached hereto as Exhibit "B" is a true copy of a letter I sent to Plaintiff's prior attorney, Thomas D'Albani on September 1, 2004. Attached hereto as Exhibit "C" is his response.
9. Attached hereto as Exhibit "D" is a true copy of a letter I sent to Plaintiff's prior attorney, Thomas D'Albani on September 8, 2004.
10. Attached to the Memorandum as Exhibit "E" is a true copy of a letter I received from Plaintiff on September 20, 2004. received a letter of September 27, 2004 from Plaintiff's current counsel, Allen Haugrud which indicates that a claim has been made to a bonding company that will be meeting with the Plaintiff and their legal counsel in the week of October 25, 2004 and after that meeting, the bonding company will determine whether or not it will accept or reject the claim and the amount of the claim. That the information from that meeting will be important evidence for the presentation of this case and the contents of that meeting should be subject to discovery.
11. That your affiant has acted with all reasonable care and diligence in seeking discovery and preparation for the trial but has been thwarted by Plaintiff's activities in changing attorneys and failing to provide attorneys with information necessary to provide responses to discovery.

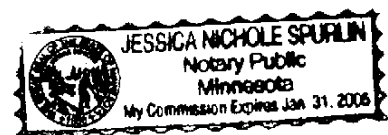
12. That your affiant will need adequate, sufficient time to review the documents that were received on September 28, 2004, which is a stack of documents approximately five inches thick to determine whether or not further depositions should be necessary, and I am already scheduled for trial on September 30, 2004, which will interfere with my ability to complete this task by the discovery deadline set by the Court.
13. That Plaintiff's current counsel has acted with as much dispatch as they could, but because of the shortness of time and Plaintiff's apparent lack of diligence in cooperating with their new attorney, discovery is not complete.
14. Further your affiant not sayeth not that this Affidavit is made in support of the Motion to Compel discovery, Motion to Extend Dispositive and Non-Dispositive Motions.

I swear under penalty of perjury under the laws of the United States that the statements in this Affidavit are true except as to statements on information and belief and as to those statements I believe them to be true. Executed this 29th day of September, 2004, at Bemidji, Minnesota.


Robert A. Woodke

Subscribed and sworn to before me this 29th day of September, 2004.


Notary Public





BROUSE, WOODKE & MEYER, PLLP

*Attorneys at Law
A Partnership of Professional Corporations
offices in Bemidji and Fosston*

EXHIBIT

B

Michael S. Brouse
Robert A. Woodke *
Bruce L. Meyer
* also admitted in Iowa
author's e-mail address:
bwmnlaw@paulbunyan.net

Reply to:
312 America Avenue NW
P.O. Box 1273
Bemidji, MN 56619-1273
Phone: 218-759-1673

Fax: 218-444-4014

September 1, 2004

Mr. Thomas D'Albani
Cann, Haskell, D'Albani
& Schueppert, PA
205 Seventh Street NW
Bemidji, MN 56601

RE: Timothy and Kari Kuechenmeister
Bky Case No. 04-60471
Adv. Case No. 04-6047

Dear Mr. D'Albani:

I have attempted to reach you by telephone to resolve the discovery dispute occasioned by your client's failure to provide us with any of the documents we have requested. As you know the discovery deadline is approaching and I will be bringing a motion to compel if the materials are not received very soon. I cannot do any trial preparation without their responses.

Once I have received and reviewed the documents I will want to depose some of the loan officers and CEO of Headwaters. Would you kindly provide me some date when you can be available for those depositions?

Your attention to this is appreciated.

Very truly yours,



Robert A. Woodke

RAW/bb

cc: Mr. & Mrs Kuechenmeister
Ms. Tamara Yon, Trustee
United States Trustee

CANN, HASKELL, D'ALBANI & SCHUEPPERT, P.A.

Attorneys at Law
205 Seventh Street NW
Bemidji, MN 56601
Telephone: 218-751-4060
Fax: 218-751-4063

DOUGLAS W. CANN
JAMES W. HASKELL*
THOMAS L. D'ALBANI**
DAVID G. SCHUEPPERT, RETIRED
ALFRED C. SCHMIDT, RETIRED

ALSO LICENSED IN
*CALIFORNIA
**ILLINOIS

September 1, 2004

Mr. Robert Woodke
Brouse, Woodke & Meyer
312 America Avenue
Bemidji, MN 56601

RE: Headwaters Federal Credit Union
Vs. Kuechenmeister

Dear Bob:

Please be advised that Mr. Allen Haugrud of Fergus Falls, MN, will be the attorney of record for the Headwaters Federal Credit Union from this point forward.

Yours truly,



Thomas L. D'Albani

TLD/rj

2/2



BROUSE, WOODKE & MEYER, PLLP

*Attorneys at Law
A Partnership of Professional Corporations
offices in Bemidji and Fosston*

EXHIBIT

1

Michael S. Brouse
Robert A. Woodke *
Bruce L. Meyer
* also admitted in Iowa
bwmlaw@paulbunyan.net

Reply to:
312 America Avenue NW
P.O. Box 1273
Bemidji, MN 56619-1273
Phone: 218-759-1673

Fax: 218-444-4014

September 8, 2004

Mr. Thomas D'Albani
Cann, Haskell, D'Albani
& Schueppert, PA
205 Seventh Street NW
Bemidji, MN 56601

Sent by fax and mail

RE: Timothy and Kari Kuechenmeister
Bky Case No. 04-60471
Adv. Case No. 04-6047

Dear Mr. D'Albani:

According to the Court's website, which I checked this afternoon, you are still the attorney of record on the adversary proceeding in the above referenced case. I still am without any discovery and it is all past due. If I do not have the discovery by Friday, I will bring a motion to compel and will seek attorneys fees and costs.

You people started this fight and yet you have not provided any discovery and you have not provided a Rule 26 Report as mandated by the rules of civil procedure which makes it impossible for me to prepare for the defense of this case. This is litigating in bad faith.

Thank you for your immediate attention to these problems.

Very truly yours,

Robert A. Woodke
RAW/js

cc: United States Trustee
Tamara Yon
Mr. and Mrs. Kuechenmeister

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

Kari Lynn Kuechenmeister
Timothy Lawrence Kuechenmeister,

Debtors.

BKY Case No. 04-60471 DDO

Headwaters Federal Credit Union,

Plaintiff,

ADV. Case No. 04-6047

vs.

Kari Lynn Kuechenmeister
Timothy Lawrence Kuechenmeister,

Defendants.

ORDER GRANTING MOTION TO COMPEL DISCOVERY

Defendants motion to compel discovery came on regularly for hearing before this Court on October 14, 2004 at 1:30 p.m. Robert A. Woodke appeared as attorney for Defendants. Allen Haugrud appeared as attorney for Plaintiff.

After considering the motion and all supporting and opposing documents, hearing counsels' oral argument, and otherwise being duly advised on all matters presented to the Court on this cause,

IT IS HEREBY ORDERED that the motion is GRANTED, and that Plaintiff must provide his answers to interrogatories no later than _____, 2004 as follows:

Defendant shall make inquiry to its parent company for all responsive discovery.

IT IS FURTHER ORDERED that the Plaintiff must provide Federal Rules of Civil

Procedure Rule 26 Report no later than _____, 2004.

Dated: _____

United States District Judge

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

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Timothy Lawrence Kuechenmeister,

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BKY Case No. 04-60471 DDO

Headwaters Federal Credit Union,

Plaintiff,

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vs.

Kari Lynn Kuechenmeister
Timothy Lawrence Kuechenmeister,

Defendants.

ORDER GRANTING MOTION TO EXTEND TIME

Defendants motion to extend time came on regularly for hearing before this Court on October 14, 2004 at 1:30 p.m.. Robert A. Woodke appeared as attorney for Defendants. Allen Haugrud appeared as attorney for Plaintiff.

After considering the motion and all supporting and opposing documents, hearing counsels' oral argument, and otherwise being duly advised on all matters presented to the Court on this cause,

IT IS HEREBY ORDERED that the motion is GRANTED, and that the Court will provide for an extension of time to cut off discovery and non-dispositive motions to November 30, 2004 and for dispositive motion to January 5, 2005.

Dated: _____

United States District Judge

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

Kari Lynn Kuechenmeister
Timothy Lawrence Kuechenmeister,

BKY Case No. 04-60471 DDO

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Headwaters Federal Credit Union,

Plaintiff,

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vs.

Kari Lynn Kuechenmeister
Timothy Lawrence Kuechenmeister,

Defendants.

UNSWORN CERTIFICATE OF SERVICE

Jessica N. Spurlin, being first duly sworn, upon oath, deposes and says that on the 29th
day of September, 2004, she did serve via United States Mail addressed to:

Allen Haugrud
Svingen, Hagstrom, Karkela,
Cline, & Dirks, PLLP
125 South Mill Street
PO Box 697
Fergus Falls, MN 56538-0697

Headwaters Federal Credit Union
301 America Ave NW
Bemidji, MN 56601

Tamara L. Yon
Trustee
PO Box 605
Crookston, MN 56716

United States Trustee
1015 U.S. Courthouse
300 South 4th Street
Minneapolis, MN 55415

in which envelopes she did place a true and correct copy of:

Notice of Motion and Motion to Compel Discovery and For Extension of Time;
Memorandum In Support of Motion to Compel Discovery;
Affidavit of Robert A. Woodke in Support of Motion to Compel Discovery and Extension of
Time to File Dispositive and Non-Dispositive Motions;
Proposed Order Granting Motion to Compel Discovery; and
Proposed Order Granting Motion to Extend Time.



Jessica N. Spurlin